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*Attorneys for Plaintiff Sierra Summit, LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SIERRA SUMMIT, LLC,

*Plaintiff,*

v.

HUMPHREYS & PARTNERS ARCHITECTS,  
NEVADA, LLC,

*Defendant.*

CASE NO.: 2:24-cv-01253-JAD-MDC

**STIPULATION TO CONTINUE  
DEADLINE TO (1) CONDUCT RULE  
26(F) CONFERENCE AND (2) FILE  
PROPOSED DISCOVERY PLAN AND  
SCHEDULING ORDER**

**(FIRST REQUEST)**

Under Local Rule IA 6-1, Plaintiff SIERRA SUMMIT, LLC (“**Plaintiff**”), by and through its undersigned counsel of record, and Defendant HUMPHREYS & PARTNERS ARCHITECTS, NEVADA, LLC (“**Defendant**,” together with Plaintiff, the “**Parties**”), by and through its undersigned counsel of record, hereby stipulate and agree to extend the deadline to conduct a FRCP 26(f) conference and to file their corresponding proposed discovery plan and scheduling, stating as follows:

1. On July 11, 2024, Plaintiff filed its Complaint. ECF No. 1.
2. Defendant filed its Answer on August 5, 2024. ECF No. 6.
3. The current deadline for the Parties to submit a proposed discovery plan and scheduling order is September 19, 2024. *See* LR 26-1(a) (requiring parties to conduct a FRCP

26(f) conference within 30 days of the first defendant appearing in the matter and to submit a stipulated discovery plan and scheduling order within 14 days thereafter).

4. The instant dispute relates to the design and construction of a multifamily housing complex in Reno, Nevada. The project spanned several years and, as a result, there is a significant amount of potentially discoverable electronically stored information subject to disclosure in this case.

5. The Parties therefore request additional time to ascertain the scope of electronically stored information that may be relevant to this matter, in order to prepare and submit an appropriate protocol for the collection, review, and production of the same.

6. Such determination will further dictate the Parties' suggested deadlines and procedures in their proposed discovery plan and scheduling order.

7. This stipulation is brought in good faith by both Parties and not for purposes of delay. This extension will not result in undue delay in the administration of this case.

8. This is the first stipulation for extension of time to submit a stipulated proposed discovery plan and scheduling order.

**IT IS THEREFORE STIPULATED**, by the Parties that:

1. The FRCP 26(f) conference shall occur on or before September 27, 2024;

2. The deadline for the Parties to file their proposed discovery plan and scheduling order is extended up to and including October 4, 2024.

Respectfully submitted this 9<sup>th</sup> day of September, 2024.

/s/ Chelsea C. Jensen

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*Attorneys for Plaintiff*

/s/ Max E. Corrick

MAX E. CORRICK, II, ESQ., NBN 6609

*Attorneys for Defendant*

1 THE COURT, having reviewed the foregoing Stipulation, and good cause appearing,  
2 HEREBY ORDERS that:

- 3 1. The Parties shall conduct a FRCP 26(f) conference on or before September 27,  
4 2024;
- 5 2. The deadline for the Parties to file their proposed discovery plan and scheduling  
6 order is extended up to and including October 4, 2024.

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8 **IT IS SO ORDERED.**

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10 **UNITED STATES DISTRICT JUDGE/UNITED**  
11 **STATES MAGISTRATE JUDGE**

12 Dated 09-16-24  
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